



September 17, 2014

VIA ECF

Honorable Steven M. Gold, U.S.M.J.
U.S. District Court, EDNY
Brooklyn, New York 11201

**Re: Freire v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 13-cv-7291**

**Dong v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 14-cv-2980**

**Alkhatib New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 13-cv-02337**

**Tuhin v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 13-cv-5643**

**Gabrys v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 13-cv-7290**

**Chowdhury v. New York Motor Group LLC et al.
United States District Court, EDNY, Case No. 14-cv-2981**

Dear Judge Gold:

This firm represents Santander Consumer USA, Inc. ("SCUSA"), a defendant in *Freire* and *Dong* -- two of six cases deemed related by the Court and referenced above.

Counsel for M&T Bank, the defendant in the *Tuhin*, *Gabrys* and *Chowdhury* cases, is on trial starting tomorrow (a trial date that arose after the scheduling conference with the Court) and asked whether the parties would consent to adjourning the date by which defendants must oppose the Plaintiffs' Motion for Leave to Amend the Complaints and must file their Cross-Motions to Dismiss the Complaints. All of the parties, including the Plaintiffs, consent to the request.

E-mail: Robert.Brener@leclairryan.com

885 Third Avenue, Sixteenth Floor
New York, New York 10022
Phone: 212.697.6555 \ Fax: 212.986.3509

Hon. Steven M. Gold
September 17, 2004
Page 2

Counsel for M&T Bank asked that I write the Court seeking the Court's approval of the following proposed revised schedule:

- Defendants' opposition/cross motions shall be filed by **September 24, 2014** (five days from the original date of September 19, 2014).
- Plaintiffs' reply papers in support of their motions and their opposition to the cross-motions shall be filed by **October 14, 2014** (six days from the original date of October 8, 2014).
- Defendants' reply papers in support of their Cross-Motions shall be filed by **October 24, 2014**, which is the original date established by the Court.
- Oral argument shall take place on **November 25, 2014**, also the original date established by the Court.

Under the revised schedule, the dates for the final set of papers and the oral argument would remain unchanged. The revised schedule would apply to all of the six cases referenced above.

Thank you for your consideration.

Respectfully,

cc: Counsel of record (via ECF)

/s/ Robert J. Brener